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September 28, 2012

Matthew Lakin, Ph.D.
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street, AIR-6
San Francisco, CA 94105

Subject: Los Angeles Department of Water and Power Comments on Great Basin Unified Air Pollution Control District 2012 Ambient Air Monitoring Network Plan

Dear Dr. Lakin:

This letter responds to Great Basin Unified Air Pollution Control District's (GBUAPCD) request that U. S. Environmental Protection Agency (EPA) approve its 2012 Ambient Air Monitoring Network Plan (2012 Network Plan). The 2012 Network Plan cannot be approved by EPA, because among other defects, GBUAPCD's PM_{10} and $PM_{2.5}$ Quality Assurance Project Plans (QAPP) have not been approved by EPA in accordance with 40 C.F.R. 58 Appendix A. This regulation requires that "*All monitoring organizations must develop a quality system that is described and approved in quality management plans (QMP) and quality assurance project plans (QAPP)…* ." (40 C.F.R. 58 Appendix A, § 2.1.) The fact that GBUAPCD is operating its monitoring network without a set of approved QAPPs is deplorable considering that this unverified data is being used to impose requirements upon the Los Angeles Department of Water and Power (LADWP) at significant public expense, and serves as the basis for determining the ultimate attainment status of the Owens Valley Planning Area (OVPA).

EPA is well aware of this serious problem with GBUAPCD's 2012 Network Plan. LADWP brought this issue to EPA's attention by its letter dated October 13, 2011. Instead of requiring GBUAPCD to comply with the law, EPA approved the 2011 Ambient Air Monitoring Network Plan. When GBUAPCD considered the 2012 Network Plan, LADWP again pointed out that the failure to approve the QAPPs violated the law. Again, GBUAPCD approved the 2012 Network Plan without approving any QAAPs. It is absurd that GBUAPCD's refusal to change the 2012 Network Plan to comply with the law means EPA will not provide a formal opportunity for public comment on this network plan.

EPA must ensure GBUAPCD complies with applicable regulations to collect and analyze data in accordance with recognized and approved quality assurance procedures. GBUPACD should be required to consider and approve adequate QAPPs in a public proceeding in order to ensure the quality, accuracy, and integrity of the data moving forward. Until this happens, any data collected pursuant to these defective Ambient Air Monitoring Network Plans must be disregarded, and the data cannot be used for determining the attainment status of the OVPA and/or to impose air quality mitigation obligations upon LADWP.

Below are LADWP's original comments on the 2012 Network Plan, with additional responses to the comments made in GBUAPCD's May 23, 2012, staff report. LADWP urges EPA to disapprove the 2012 Network Plan until it complies with the law.

1. Background

In June 2012, Mr. Theodore Shade, Air Pollution Control Officer (APCO) for GBUAPCD, submitted to EPA its 2012 Network Plan dated April 20, 2012, including, in Appendix B, the proposed network plan for the National Core (NCORE) monitoring station located at the White Mountain Research Station, east of Bishop, California. The GBUAPCD Board of Governors approved the 2012 Network Plan May 24, 2012. LADWP reviewed the 2012 Network Plan and had a number of questions and concerns regarding the proposed network and monitoring approach advocated by GBUAPCD, including the proposed NCORE plan. LADWP submitted these questions and concerns in a comment letter to the GBUAPCD Board on May 16, 2012. However, in the staff report for the May 24 GBUAPCD Board meeting – prepared less than two days after GBUAPCD received LADWP's May 16 letter – GBUAPCD staff either ignored or outright rejected all of LADWP's requests and suggestions on the 2012 Network Plan. The short review period within which GBUAPCD staff drafted the report and issued their recommendation to the GBUAPCD Board raises serious questions about whether LADWP's comments were given adequate consideration by the APCO and GBUAPCD staff prior to the 2012 Network Plan being submitted to the GBUAPCD Board for approval, and then to EPA for ultimate approval.

2. GBUAPCD Quality Assurance Project Plans

As noted above, LADWP is concerned that GBUAPCD has been operating its PM_{10} and $PM_{2.5}$ network in the Owens Valley without EPA-approved QAPPs. Title 40 Code of Federal Regulations (CFR) Part 58 Appendix A requires, among other things, that "*All monitoring organizations must develop a quality system that is described and approved in quality management plans (QMP) and quality assurance project plans (QAPP)…*" (40 C.F.R. 58 Appendix A, § 2.1). On September 8, 2011, LADWP requested copies of the GBUAPCD PM_{10} and $PM_{2.5}$ QAPPs. The PM_{10} and $PM_{2.5}$ QAPPs were received from

GBUAPCD on September 22, 2011, and September 27, 2011, respectively. Both QAPPs were unsigned, designated as "drafts" (dated March 2001 and November 2002, respectively), and presumably, never approved by EPA.

In later correspondence related to LADWP's appeal of GBUAPCD's 2011 Supplemental Control Requirement Determination (2011 SCRD) to the California Air Resources Board (ARB),[1] attorneys for GBUAPCD argued that GBUAPCD and other districts have approved QAPPs under the ARB, and that ARB has obtained EPA's approval for the QAPPs. However, the ARB Quality Assurance Plan (QAP)[2] referenced in the GBUAPCD brief does not fulfill the quality assurance project plan requirements in 40 C.F.R. 58 because it does not address all the unique instrument systems and processes that generate the data used to identify supplemental control areas on Owens Lake, nor does it address GBUAPCD's monitoring organization, among other omissions. Some of those missing system elements (*e.g.*, sand motion monitoring, video monitoring) are described on page 11 of the 2012 Network Plan's section entitled "Dust Identification Program." To be clear, although the ARB QAP encompasses the SLAMS network that is the subject of the 2012 Network Plan, it does not cover the *use* of this data to identify supplemental dust control areas on Owens Lake because it does not properly assure quality for all the instrument systems that are used in the dust source identification process described in the 2008 GBUAPCD Owens Valley State Implementation Plan (2008 SIP).

LADWP requested that GBUAPCD update its PM_{10} and $PM_{2.5}$ QAPPs, encompassing all of the instrument systems that are required to implement the procedures described in the 2008 SIP, including the monitoring organization structure and functions, and to have them approved in a public proceeding in order to ensure that the data are being collected and analyzed in accordance with recognized quality assurance procedures. LADWP also requested that GBUAPCD complete this work expeditiously, as the monitoring network is active and currently being used to identify emissive sources on Owens Lake and the Keeler Dunes, evaluate compliance within the OVPA, and to assess the contributions from Owens Lake as far away as the Coso Junction Maintenance Area.

In response to LADWP's comments above regarding the lack of approved QAPPs, GBUAPCD asserted in its May 23, 2012, staff report that: "*...it is not the LADWP's*

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1 GBUAPCD's Opposition Brief Regarding the 2011 SCRD Appeal, State of California Air Resources Board, dated April 19, 2012.

2 The ARB QAP was designed primarily as a guidance document for the operation of quality assurance programs used by the ARB, local air districts, and industry, whereas a QAPP is a more detailed plan that describes the quality assurance procedures for a particular project.

place to determine the validity of the ARB or District's QAPP," and that "*...these documents are scheduled for revision during the 2012 calendar year.*" First, LADWP's comments were submitted as part of the public review period. Second, it is very much LADWP's business to question the content and validity of GBUAPCD's QAPPs. GBUAPCD's monitoring network has been operating on the Owens playa for over 10 years, and the data collected from the network have led to the identification, design, and implementation of over 40 square miles of dust controls on the playa, at a cost of well over $1 billion dollars. LADWP and the nearly 4-million citizens it serves have every right to expect that the agency responsible for ordering dust controls in the OVPA – GBUAPCD – is in compliance with all federal rules governing the collection and quality assurance of data used in the decision making process. GBUAPCD has been negligent in these duties for more than 10 years. Moreover, even if the PM_{10} QAPP is eventually approved in 2012 as GBUAPCD contends, it is far too little too late for LADWP and its ratepayers. EPA and ARB share proportional responsibility for allowing GBUAPCD's breach of these obligations to continue for so long and at such great expense to LADWP.

3. Overall Monitoring Network Design

GBUAPCD's network of source impact monitors is focused almost entirely on Owens Lake. This is problematic because the current network does not adequately assess the contributions from other off-lake source areas that also affect air quality within the OVPA, an area much larger that encompasses much more than simply Owens Lake.

Of the 18 monitors listed in the draft 2012 Network Plan, 11 are designated as "source impact" monitors, and *all* of these source impact monitors are located on or immediately around Owens Lake and the Keeler Dunes. Given the fact that high PM_{10} concentrations originate from off-lake sources upwind and downwind of Owens Lake, GBUAPCD should extend its network to encompass some of these source areas, which affect local communities as well as the overall attainment status of the OVPA. LADWP has provided abundant evidence to GBUAPCD over the years that high PM_{10} concentrations originate outside of Owens Lake. LADWP requested that GBUAPCD identify the major off-lake source areas (including the Olancha Dunes and the string of ancient dry riverbeds just north of Owens Lake along the eastern side of the valley) and to monitor them for both sand motion and dust emissions. This information would have assisted GBUAPCD in their recent assessment of the contribution of Owens Lake dust emissions at the Coso Junction PM_{10} monitor, located 18 miles south of Owens Lake. GBUAPCD's modeling analysis did not include any off-lake dust sources because the information required to characterize those sources is not being collected by GBUAPCD. If GBUAPCD is truly interested in understanding the sources of dust that are affecting

the Coso Junction monitor, then it should expand its source-impact monitoring network beyond Owens Lake.

The Owens Lake network described on page 10 of the 2012 Network Plan states that: "*An additional monitor is located 20 miles south of the lake at Coso Junction.*" It is questionable how a single monitor, located some 20 miles south of Owens Lake with large off-lake sources in between, can be considered an adequate part of the Owens Lake network. LADWP requested that GBUAPCD either explain its reasoning more thoroughly or remove this statement from the 2012 Network Plan; however, GBUAPCD failed and refused to do so.

GBUAPCD also took issue with LADWP's statement that: "*high PM_{10} concentrations originate from sources upwind and downwind of Owens Lake.*" GBUAPCD abruptly dismissed LADWP's concerns, stating that: "*LADWP offers no scientifically defensible data to prove this assertion.*" GBUAPCD's response is preposterous and untenable, and ignores GBUAPCD's own data. LADWP has provided abundant evidence of the importance off-lake sources within the Owens Valley, most of this extracted from the District's own record. Evidence was submitted as part of, among other things, LADWP's 2005 Alternatives Analysis, 2008-2010 Owens Lake Expert Panel proceedings, 2011 Alternatives Analysis, and in numerous letters sent to both EPA and GBUAPCD regarding the influence of off-lake sources on the Owens Lake and Coso Junction monitors. GBUAPCD's curt response proves LADWP's point that GBUAPCD is failing to adequately investigate off-lake sources.

In providing its own "proof" that large, off-lake sources are non-existent between Owens Lake and Coso Junction, GBUPACD states: "*District staff regularly visually monitors the area between Owens Lake and Coso Junction and has never identified any 'large off-lake sources.'*" This is not entirely accurate. As GBUAPCD knows, the Olancha Dunes are located between Owens Lake and Coso Junction, and these natural dunes are frequently and, at times, highly, emissive. Many other known or suspected dust source areas are located between Owens Lake and Coso Junction, including a large expanse of seasonally dry ponds near the Olancha refuse transfer station, and two large and mostly barren fields located between one and four miles north of the Coso Junction monitor. LADWP pointed out these sources and their possible influence on the Coso Junction monitor in a March 15, 2012, letter to EPA, which was copied to GBUAPCD.

Finally, GBUAPCD stated that: "*Air quality data indicate that total annual PM_{10} contributions from offlake [sic] sources are a very small percentage of the PM10 emissions. The Board approved emission inventory in the 2008 SIP confirms this fact.*" First, Board approval of an emission inventory is not evidence that the inventory is correct or complete. Second, LADWP has conducted its own assessment showing that GBUAPCD has, through a combination of errors and omissions in the 2008 SIP, underreported the off-lake PM_{10} emissions within the OVPA by as much as 74,000 tons

of PM_{10} per year. GBUAPCD has this information which was submitted as part of LADWP's appeal to ARB of the 2011 SCRD.

4. Comments on Individual Monitors

A. Keeler PM_{10} and $PM_{2.5}$ Monitors

Keeler $PM_{2.5}$ and PM_{10} monitors appear to violate EPA's siting criteria contained in 40 C.F.R. 58 Appendix E. Under 40 C.F.R. Part 58, Appendix E, 3. Spacing from Minor Sources: "The plume from the local minor sources should not be allowed to inappropriately impact the air quality data collected at a site. Particulate matter sites should not be located in an unpaved area unless there is vegetative ground cover year round, so that the impact of wind blown dusts will be kept to a minimum." Keeler monitors are located atop the GBUAPCD laboratory building near the center of town, which is surrounded by a network of unpaved streets and roadways that can be dusty under high winds with no traffic. The old State Highway leading south out of Keeler is particularly emissive because the old asphalt is seriously degraded and sand covers many parts of the roadway. This old road continues to be used as a shortcut to Highway 136 and dust plumes generated by passing vehicles have been observed to cross the Keeler PM_{10} monitor under southerly winds. Moving the monitor to the north edge of town would eliminate some of these local influences and provide a more representative sample of the air quality arriving from sources located outside of town. LADWP requested that, at a minimum, GBUAPCD consider paving the road that runs along the east side of their laboratory facility (the west side is paved) because that road is still open and actively used.

GBUAPCD responded to LADWP's comment by stating that: "*they [LADWP] offer no scientific evidence of the extent of the alleged influence*" from unpaved roads. GBUAPCD also stated that LADWP had misread EPA's siting criteria in Title 40 C.F.R. Part 58 Appendix E, Section 6.3(b), which states that: "*The intent is to locate localized hot-spot sites in areas of highest concentrations whether it be from mobile or multiple stationary sources.*"

It is GBUAPCD's – not LADWP's – responsibility to ensure its monitors comply with EPA's requirements. The facts that the monitor is surrounded by a network of ***unpaved*** streets and roadways, and that LADWP has observed that dust plumes generated by passing vehicles cross the Keeler PM_{10} monitor is sufficient to show that the monitor location violates EPA's siting requirements. Furthermore, regardless of whether there is proof of impact or not, it is still GBUAPCD's responsibility to adhere to EPA's siting criteria.

With respect to GBUAPCD's statement that LADWP misread the siting criteria, the purpose of the Keeler monitor is to record emissions from Owens Lake, not to monitor the influence of nearby mobile or stationary sources. If the Keeler monitor is to be used to calculate Owens Lake K-factors (emission rates), or to evaluate the PM_{10} concentrations attributable to Owens Lake, then GBUAPCD must first subtract the influence from these localized, non Owens Lake sources. The responsibility for this action lies with GBUAPCD, not with LADWP. As suggested above, GBUAPCD would be better served by siting the station away from heavily travelled unpaved roads.

B. North Beach PM_{10} Monitor

The North Beach PM_{10} monitor also appears to violate EPA siting criteria contained in 40 C.F.R. 58 Appendix E. The location of the North Beach monitor is especially problematic because it is located adjacent to two heavily used unpaved roads: a north-south gravel haul road leading to the Zone 1 shallow flood areas, and the (very dusty) east-west Boulder Creek Road used for local access.

GBUAPCD responded by claiming that: "*The District is solely responsible for siting..*"; that "*The North Beach monitor was a compromise..*"; that ARB and EPA have both audited this site, and that "*No adverse comments about station siting have ever been made.*" None of these comments address LADWP's concerns that the North Beach station is poorly sited because it is located adjacent to two heavily used, unpaved haul roads. LADWP renews its request that this station be relocated to a more suitable location that is not so greatly influenced by local dust sources.

C. Flat Rock PM_{10} Monitor

The 2012 Network Plan states that during April 2011, the PM_{10} monitor at Flat Rock was shut down and moved northeast to the Mill Site (page 10, last paragraph). No reason was given why the Flat Rock station was discontinued, or why the Mill Site was chosen. It is important to know why these changes were made. Both LADWP and GBUAPCD have evidence that the Flat Rock monitor was recording emissions from an off-lake source area located between the monitor and the regulatory shoreline. These emissions could have been the reason for the move. However, the Flat Rock dune area is just one of several off-lake source areas that are known to affect shoreline monitors under certain meteorological conditions. LADWP stated that GBUAPCD *should* be monitoring the emission contribution from known off-lake sources, and that the removal of the Flat Rock dunes monitor appears to be another example of GBUAPCD's desire to disregard the emission contributions of off-lake dust sources. Moreover, off-lake source areas also influence the Mill Site. Screening for on-lake wind directions cannot remove the influences of off-lake sources.

GBUAPCD responded by claiming that these were "*accusation[s] against the District with no scientific evidence provided to defend it.* GBUAPCD already has scientific evidence supporting LADWP's concerns. Both GBUAPCD and LADWP are well aware of the influence of the Flat Rock dunes and surrounding desert due to the fact that a sand-motion monitoring device was installed there in October 2008 at LADWP's insistence. A significant amount of sand motion was recorded at that location which confused the signal from Owens Lake, but also provided evidence of a relatively large off-lake dust source.

LADWP reiterates its comment that the 2012 Network Plan should explain why the Flat Rock monitor was discontinued, and why the Mill Site was selected. Regarding the latter comment, it is very important for the 2012 Network Plan to address the possible influences from nearby, off-lake dust sources. At the very least, GBUAPCD should install a sand-motion monitoring device at the Mill Site (as was true at Flat Rock) in order to verify whether and to what extent off-lake sources are influencing the recorded concentrations.

D. Coso Junction PM_{10} Monitor

GBUAPCD improperly utilizes data from the Coso Junction PM_{10} monitor to assess the contributions from Owens Lake. This is improper because (1) the Dust ID model has very poor predictive capability, even at the relatively short plume transport distances across Owens Lake; (2) the Dust ID modeling protocol described in the 2008 SIP does not address the unique surface and meteorological conditions that prevail over the long transport distances between Owens Lake and the Coso Junction Maintenance Area (CJMA); and (3) the Dust ID model does not include any of the several known off-lake source areas that influence downwind dust concentrations, and which are therefore critical for apportioning the PM_{10} concentrations arriving at the Coso Junction monitor. Some, but not all of these non-Owens Lake dust sources, were documented in a letter to the EPA dated March 15, 2012, a copy of which was also sent to GBUAPCD.

GBUAPCD responded that (regarding the March 15, 2012, report): "*These assertions have no scientific merit. The 'dust sources' that were documented in LADWP's letter of March 15, 2012, contain no data whatsoever and have only pictures of 'sources' that are encrusted and not emissive. There is a difference between a scientifically defensible argument and a few pictures that show non-emissive surfaces. Many of the areas pictured in LADWP's letter were visited by District staff and found to have a competent crust that would not become emissive in a wind event.*"

The purpose of LADWP's March 15, 2012, letter was to notify both EPA and GBUAPCD that there are dust sources located nearby and immediately upwind of the Coso Junction monitor that could be influencing the dust concentrations there, and also

to point out that it is GBUAPCD's responsibility to investigate whether these sources are attributing any exceedances at the Coso Junction monitor to Owens Lake. GBUAPCD's response, that they visited the sites and found them to be non-emissive, is, to put it mildly, ludicrous. Temporal changes in surface conditions can render these areas emissive during some parts of the year and completely non-emissive during other parts of the year. The abundance of sand and sand-sized particles captured by vegetation and around fences is a testament to the fact that these areas are active during high wind events. GBUAPCD cannot dismiss these possible dust sources with one field visit. It is GBUAPCD's responsibility – not LADWP's – to investigate these potential sources before attributing the exceedances at the Coso Junction monitor to Owens Lake.

5. Specific Comments on 2012 Network Plan

A. Page 6, Table 1

The Special Purpose Monitors at T-8 and T-25 have been inactive since March 2010 and should be removed from this table.

GBUAPCD provided no response to this comment.

B. Page 6, Table 1

The Special Purpose Monitors at T-4 and T-23 are currently being relocated on the Owens playa. It is LADWP's understanding that GBUAPCD has selected new locations for the monitors, and has solicited help from LADWP in moving them. GBUAPCD should include the new locations in this plan for public review and comment. Otherwise, the stations will be installed and collecting data before they have been formally reviewed and approved.

GBUAPCD responded that: "*Changes in SPM station do not require approvals. The intent is to provide the District with the flexibility to install and operate monitors for short-term studies and to move them as deemed necessary by District staff.*" LADWP does not understand GBUAPCD's reluctance to solicit public input. GBUAPCD's actions affect LADWP and its ratepayers. The monitors at T-4 and T-23 were installed at those locations with LADWP's approval, and for the sole purpose of providing more refined K-factors on the playa. GBUAPCD should be willing to provide LADWP with sufficient information to understand where the stations might be moved and why, and this information should be disclosed in the annual plan that is open for public review and comment.

C. Page 6, Table 1

The Flat Rock TEOM was decommissioned in May 2011. As a result, the Flat Rock monitor should either be removed from the table, or the table revised to show that meteorological data only are collected at this site.

GBUAPCD provided no response to this comment.

D. Page 6, Table 1

The 2012 Network Plan should remove all reference to the Simis Residence monitor. Simis Residence PM_{10} monitor was decommissioned in August 2008, and the meteorological monitoring was suspended in July 2011. No monitoring at this location is planned for 2012.

GBUAPCD provided no response to this comment.

E. Page 8, "Core-Based Statistical Area"

This phrase appears nowhere else in the document and should be removed from this list of definitions.

GBUAPCD provided no response to this comment.

F. Page 8, "Micropolitan Statistical Area"

This phrase appears nowhere else in the document and should be removed from this list of definitions.

GBUAPCD provided no response to this comment.

G. Page 9, "Population Exposure"

This phrase appears nowhere else in the document and should be removed from this list of definitions.

GBUAPCD provided no response to this comment.

H. Page 9, "Representative Concentration"

This phrase appears nowhere else in the document and should be removed from this list of definitions.

GBUAPCD provided no response to this comment.

I. Page 9, "Trend Analysis"

This phrase appears nowhere else in the document and should be removed from this list of definitions.

GBUAPCD provided no response to this comment.

J. Page 9, "Site Comparison"

This phrase appears nowhere else in the document and should be removed from this list of definitions.

GBUAPCD provided no response to this comment.

K. Page 11, Dust Identification Program, lines 1-4

The text identifies special purpose monitors at T-4 and T-23, but fails to mention that the monitoring stations are being moved, or to what location the monitors are being relocated. It is LADWP's understanding that GBUAPCD has selected new locations, and that the monitors are in the process of being relocated. If true, GBUAPCD should be required to disclose this information in the 2012 Network Plan for public review and comment prior to acceptance of any data collected at the new locations.

GBUAPCD responded disingenuously that: "At the time of the writing of the monitoring plan locations for the special purpose monitors had not yet been finalized. Special purpose monitors require no formal review or approval," and that: "The intent is to provide the District with the flexibility to install and operate monitors for short-term studies and move them as deemed necessary by District staff." LADWP reminds GBUAPCD that the installation of special purpose monitors at T-4 and T-23 was by mutual agreement as part of a failed effort to improve the accuracy of the on-lake K-factors (they are still highly inaccurate), and moreover, that LADWP provided the TEOM instruments and shelters that were eventually used. These monitors are not intended to be used to show attainment under the 2008 SIP, and LADWP's consent and cooperation is contingent upon these monitors not be used for purposes of showing

attainment. LADWP's consent and cooperation is required because the 2008 SIP stipulates that only shoreline monitors may be used in computing K-factors. Intended locations and uses must be disclosed in the 2012 Network Plan. If GBUAPCD does not provide the requested information, LADWP will withdraw its agreement and protest the use of any on-lake TEOM data on grounds that it violates the 2008 SIP.

L. Page 13, Mono Lake

This paragraph contains outdated information about the Simis Residence monitor, which was discontinued in August 2008. The out-of-date information should be removed from this paragraph.

GBUAPCD provided no response to this comment.

M. Page 13, Mono Lake, lines 12-13

The statement "*This network is used to provide information on what portion(s) of the exposed shoreline are emissive and to what extent during a given storm*" is a gross overstatement and therefore misleading. The system can only be used (and even then with a high degree of uncertainty) to identify emissive areas within the enclosed area of the 25 Sensits shown on the lower right side of Figure 5. The lineal extent of the Mono Lake shoreline within this Sensit network is roughly only 4 percent of the total.

GBUAPCD provided no response to this comment.

N. Page 14, 5.0 Recent or Proposed Modifications to Network, Owens Lake

This paragraph again mentions the inactive Special Purpose Monitors at T-8 and T-25. Both have been inactive for many years and therefore should be removed from the 2012 Network Plan. In addition, this paragraph mentions that the Special Purpose Monitors at T-4 and T-23 are being moved by "mid-2012," but doesn't mention where or why the monitors are being relocated. LADWP understands that GBUAPCD has selected new locations and is currently moving the stations. If this is true, then GBUAPCD should be required to disclose this information in the 2012 Network Plan for public review and comment prior to acceptance of any data collected at the new locations.

GBUAPCD's response to this comment is addressed in Item K.

O. Page 16, 6.0 Minimum Monitoring Requirements, PM_{10}

The tabulated data in this section indicates that there are 12 active monitors in the Owens Lake non-attainment area. By LADWP's count, there are only 11 monitors proposed for 2012.

GBUAPCD provided no response to this comment.

P. Page 23, Quality Assurance Status

This paragraph implies that GBUAPCD has approved QAPPs when it states: "*The District's current Quality Assurance Project Plans...*" As previously discussed, GBUAPCD does not have its own approved PM_{10} QAPP. This statement must be corrected, to avoid further misunderstandings. For example, EPA appears to have been misled in its 2008 technical systems audit of the California ARB air quality network that GBUAPCD has its own independent QAPP based upon several statements EPA made, including the following:[3]

- "During the audit, EPA received a copy of GBUAPCD's most recent PM10 QAPP which will be reviewed for approval by Region 9."
- "Finding GB1: Great Basin operates an independent monitoring, laboratory and QA program from that of ARB."
- "Discussion GB1: GBUAPCD has independent QAPPs for its PM2.5 and PM10 monitoring programs and laboratory operations. The QAPPs incorporate SOPs written by the District. QA oversight by ARB consists of a flow audit once per year."

These statements are not correct, and contradict GBUAPCD's representation to ARB that it operates under ARB QAPPs. The 2012 Network Plan should clarify that GBUAPCD does not have approved PM_{10} and $PM_{2.5}$ QAPPs.

GBUAPCD provided no responses to these comments.

The specific issues and concerns outlined above, unless properly addressed, greatly undermine the credibility of GBUAPCD's monitoring network and the associated data collected pursuant to this network. These issues must be addressed prior to EPA approval of the 2012 Network Plan. In addition, GBUPACD should be required to update both QAPPs and consider them in a public proceeding in order to ensure the

[3] Technical Systems Audit of the California ARB, 2007, conducted by the EPA Region 9.

quality, accuracy, and integrity of the data moving forward. Until this happens, all data, including all data to date, must be disregarded and cannot be utilized to determine the attainment status of the OVPA.

We appreciate EPA's consideration of these requests. Please contact me at (213) 367-1014 or Mr. William T. VanWagoner, Manager of Owens Lake Regulatory Issues and Future Planning, at (213) 367-1138 if you have any questions.

Sincerely,

Martin L. Adams
Director of Water Operations

WTVW:vf
c: William T. VanWagoner